

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:24-cv-60312-AHS

DVASH AVIATION HOLDINGS, LLC,

Plaintiff,

v.

AMP LEASING LIMITED,

Defendant.

**UNOPPOSED DEFENDANT'S MOTION FOR ADDITIONAL EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

The Defendant AMP Leasing Limited ("AMP Leasing"), by and through its undersigned counsel, submits this unopposed motion pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an additional four-day extension of time through Friday, January 31, 2025 for AMP Leasing to respond to the Motion for Summary Judgment [DE 36] filed by the Plaintiff Dvash Aviation Holdings, LLC ("Dvash") (the "Unopposed Motion"). For the reasons set forth below, the Unopposed Motion should be granted.

1. On or about December 28, 2024, the Motion for Summary Judgment [DE 36] was filed with the Court.

2. The current date to respond to the Motion for Summary Judgment is Monday, January 27, 2025, based on this Court having previously granted a two-week extension of time [DE 38].

3. Undersigned counsel is in the process of reviewing and analyzing the statements contained in the Motion for Summary Judgment, together with the documents submitted by Dvash in support of the Motion for Summary Judgment, and requires additional time to confer with the

client, review documents, and prepare a response to the Motion for Summary Judgment.

4. In addition, a mediation of the matter is scheduled for Monday, January 27, 2025 and the parties have agreed to conduct the deposition of David Butler, the President of Dvash on Thursday, January 30, 2025.

5. In order to do such a review of the factual and legal statements contained in the Motion for Summary Judgment and prepare the response, conduct the mediation, and take the deposition, counsel for AMP Leasing requires an additional four-day extension of time through Friday, January 31, 2025.

6. Undersigned counsel contacted counsel for Dvash regarding the relief requested in this Unopposed Motion and represents to the Court that counsel for Dvash has no objection to the extension of time requested in this Unopposed Motion.

WHEREFORE, the Defendant AMP Leasing respectfully requests that this Court grant the Unopposed Motion and extend the time for AMP Leasing to respond to the Motion for Summary Judgment through Friday, January 31, 2025, together with granting such other and further relief as to this Court appears just and proper.

Respectfully submitted,

/s/ Seth P. Robert

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Certificate of Service

I hereby certify that on January 24, 2025 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

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